

EXHIBIT D

Subject: Re: Michael Lockhart
Date: Wednesday, October 4, 2023 at 11:17:02 AM Pacific Daylight Time
From: Yolanda Huang
To: Jemma Parker Saunders
CC: Peter Bertling, Peters, Temitayo O., Reitmeyer, Charles J., Wheeling, Emily Kimmelman, Tom Nanne, Stephanie Aguiniga, Thomas, Gregory B., Rick Brody, Cyndi Sierra
Attachments: image001.png, image001.png

Ms. Saunders,
You do not have my consent to file a dismissal with prejudice.

Yours truly,
--

Yolanda Huang, Esq.

PO Box 5475 • Berkeley • CA • 94705 • Phone:510-329-2140 • Fax:510-580-9410

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Yours truly,

On Wed, Oct 4, 2023 at 11:09 AM Jemma Parker Saunders <jemma@bertlinglawgroup.com> wrote:

Ms. Huang,

We reject your revision. As stated by Pete yesterday, “should plaintiffs not agree to a dismissal *with* prejudice, we will proceed with Mr. Lockhart’s deposition and taking a certificate of non-appearance. We will then ask Judge Corley for an order of dismissal and award of costs.”

Please advise whether Mr. Lockhart consents to a dismissal with prejudice by 3:00 p.m. Thank you.

Sincerely,

Jemma



Jemma Parker Saunders | Attorney

Bertling Law Group

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Santa Barbara, CA 93101

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From: Yolanda Huang <yhuang.law@gmail.com>

Date: Wednesday, October 4, 2023 at 8:50 AM

To: Jemma Parker Saunders <jemma@bertlinglawgroup.com>

Cc: Peter Bertling <peter@bertlinglawgroup.com>, "Peters, Temitayo O." <TPeters@bwsllaw.com>, "Reitmeyer, Charles J." <charles.reitmeyer@morganlewis.com>, "Wheeling, Emily Kimmelman" <emily.wheeling@morganlewis.com>, Tom Nanney <tomnanney@gmail.com>, Stephanie Aguiniga <stephanie@bertlinglawgroup.com>, "Thomas, Gregory B." <gthomas@bwsllaw.com>, Rick Brody <rick@brodylaw.com>, Cyndi Sierra <cyndi@bertlinglawgroup.com>

Subject: Re: Michael Lockhart

see edited copy attached. As edited, you have plaintiffs' consent to file.

On Tue, Oct 3, 2023 at 4:28 PM Jemma Parker Saunders <jemma@bertlinglawgroup.com> wrote:

Counsel:

Per Pete's email, attached please find the proposed stipulation and order regarding Michael Lockhart. Please advise if I have your authorization to e-sign and file, or if you have revisions, please track them. Thank you.

Sincerely,

Jemma

Jemma Parker Saunders | Attorney

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From: Peter Bertling <peter@bertlinglawgroup.com>

Date: Tuesday, October 3, 2023 at 1:26 PM

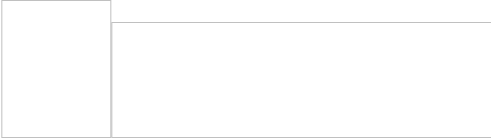
To: Yolanda Huang <yhuang.law@gmail.com>, "Peters, Temitayo O." <TPeters@bwsllaw.com>, "Reitmeyer, Charles J." <charles.reitmeyer@morganlewis.com>, "Wheeling, Emily Kimmelman" <emily.wheeling@morganlewis.com>, Tom Nanney <tomnanney@gmail.com>, Stephanie Aguiniga <stephanie@bertlinglawgroup.com>, "Thomas, Gregory B." <gthomas@bwsllaw.com>, Jemma Parker Saunders <jemma@bertlinglawgroup.com>, Rick Brody <rick@brodylaw.com>

Subject: Re: Michael Lockhart

Yolanda:

We will only agree to a dismissal *with* prejudice. We will proceed with his deposition and taking a certificate of non-appearance. We will then ask Judge Corley for an order of dismissal and award of costs. This can be avoided if Mr. Lockhart agrees to a dismissal with prejudice.

Regards,



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From: Yolanda Huang <yhuang.law@gmail.com>

Date: Tuesday, October 3, 2023 at 1:23 PM

To: Peters, Temitayo O. <TPeters@bwslaw.com>, Reitmeyer, Charles J. <charles.reitmeyer@morganlewis.com>, Wheeling, Emily Kimmelman <emily.wheeling@morganlewis.com>, Tom Nanney <tomnanney@gmail.com>, Peter Bertling <peter@bertlinglawgroup.com>, Stephanie Aguiniga <stephanie@bertlinglawgroup.com>, Thomas, Gregory B. <gthomas@bwslaw.com>, Jemma Parker Saunders <jemma@bertlinglawgroup.com>, Rick Brody <rick@brodylaw.com>

Subject: Michael Lockhart

I have just confirmed with Michael Lockhart that he does not want to appear at his deposition on Oct. 5th and that I have his consent to dismiss his claims, without prejudice. If you prepare the documents, I will sign on his behalf.

--

Yolanda Huang, Esq.

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